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GREGORY D. LEWIS; J. HALLOCK; K. MCGUYER;
MATTHEW CATE AND T.A. WOOD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RAYMOND J. MANZANILLO,

Plaintiff,

v.

GREGORY D. LEWIS, et al.,

Defendants.

Case No. 3:12-cv-05983-JST

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO STAY THIS ACTION FOR A
PERIOD OF FOUR WEEKS AND TO
CONTINUE THE CASE MANAGEMENT
CONFERENCE SCHEDULED FOR
AUGUST 19, 2015**

Pursuant to Civil Local Rule 6-2, Plaintiff Raymond J. Manzanillo and Defendants N. Brown, Gregory D. Lewis, J. Hallock, K. McGuyer, Matthew Cate, and T.A. Wood (collectively “the Parties”) by and through their respective counsel hereby stipulate and request that the Court (1) stay this action for a period of four weeks from the date of the Court’s Order granting this request; (2) continue the case management conference currently scheduled for August 19, 2015, to a date convenient for the Court that follows the end of the stay; and (3) continue the current August 7, 2015, deadline for the Parties to file case management statement.

Plaintiff’s counsel only recently gained access to visit Mr. Manzanillo in Corcoran State Prison and to documents in Mr. Manzanillo’s possession. Plaintiff’s counsel is currently working with counsel for the Defendants to ensure that Plaintiff’s counsel has access to all documents exchanged by the Parties in discovery thus far. The proposed stay will require the Court to reschedule the August 19 case management conference and extend the deadline for the Parties to file a case management statement, but it should not otherwise have a significant effect on the schedule for this case. Moreover, the requested stay will preserve both the Parties’ and the Court’s resources, as it will allow Plaintiff’s counsel the opportunity to secure and review the materials already produced by Defendants before participating in a case management conference or any additional litigation practice.

IT IS SO STIPULATED.

DATED: August 5, 2015

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Michael A. Wahlander

Francis J. Ortman III
Aryeh M. Hersher
Jason M. Allen
Michael A. Wahlander

Attorneys for Plaintiff
RAYMOND J. MANZANILLO

1 DATED: August 5, 2015

Respectfully submitted,

2 MCNAMARA LAW FIRM

3
4 By: /s/ William Lee McCaslin

5 Peter Jon Hirsig
William Lee McCaslin

6 Attorneys for Defendant
7 N. BROWN

8
9 DATED: August 5, 2015

Respectfully submitted,

10 CALIFORNIA STATE ATTORNEY
11 GENERAL'S OFFICE

12
13 By: /s/ Michael James Quinn

Michael James Quinn

14 Attorneys for Defendants
15 GREGORY D. LEWIS; J. HALLOCK;
16 K. MCGUYER; MATTHEW CATE AND
17 T.A. WOOD

18 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

19 I, Michael A. Wahlander, attest that concurrence in the filing of this stipulation has been
20 obtained from the signatories, William Lee McCaslin and Michael James Quinn, counsel for
21 Defendants.

22 Executed this 5th day of August 2015, in San Francisco, CA.

23
24 /s/ Michael A. Wahlander

25 Michael A. Wahlander

[PROPOSED] ORDER

Based on the Parties' stipulation and good cause appearing, the Court orders as follows:

1. All further proceedings are STAYED for four weeks from the date of this order.
2. The Case Management Conference currently scheduled for August 19, 2015, and the deadline for the Parties' to file Case Management Statements, currently August 7, 2015, will be rescheduled to dates following the end of the stay.

DATED: August 6, 2015

